

SUPERIOR COURT OF WASHINGTON IN AND FOR FRANKLIN COUNTY

WASHINGTON TRUST BANK, a
Washington banking corporation,

Plaintiff,

v.

EASTERDAY RANCHES, INC., a
Washington corporation; EASTERDAY
FARMS, a Washington general partnership;
CODY EASTERDAY, individually; DEBBY
EASTERDAY, individually; KAREN
EASTERDAY, individually and in her capacity
as personal representative of the Estate of Gale
Easterday,

Defendants.

NO. 21-2-50049-11

DECLARATION OF TIM COBB IN
SUPPORT OF MOTION TO APPOINT A
RECEIVER

I, TIM COBB, hereby make the following declaration:

1. I am over the age of eighteen, not a party hereto, competent to testify as to the
matters set forth herein, and I make this declaration based upon my own personal knowledge.

2. I am the President of Farmland Company Management, Inc. ("FCM").

3. FCM has three decades of experience managing, appraising, and consulting
directly with farms, farmland, rangeland, and cattle production in the Pacific Northwest.

Currently FCM has nearly 120,000 acres of crop/pastureland under direct management for its

DECLARATION OF TIM COBB IN SUPPORT OF
MOTION TO APPOINT A RECEIVER: 1

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

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1 clients; with proven management systems and regional expertise that ensure the underlying
2 asset is productive and cared for properly. The FCM team includes licensed & bonded brokers,
3 appraisers, and consultants whose singular focus is work in the Agriculture industry. FCM team
4 members come from local and regional farming backgrounds (direct production) in irrigated
5 and dryland cropping operations and have worked in the professional services sector of
6 Agriculture for decades dealing across a myriad of situations and challenges. Based in
7 Spokane, FCM offices provide the local proximity and knowledge to the Inland Northwest and
8 Columbia Basin farming areas, as FCM team members are out in these areas on a weekly basis
9 to care for the acres under our management ensuring a solid understanding of the current
10 constraints and challenges facing farm producers and landowners. The FCM team has direct
11 experiences handling all facets of farm management, financing, farm specific accounting,
12 general asset oversight, crop rotation, valuation, acquisition, disposition, partition, dispute
13 resolution, expert witness, and receivership tasks for both small and large organizations.
14 Current clients include multinational corporations, equity investment fund companies, regional
15 financial institutions, trust companies, and individuals who have asset interest in agriculture
16 lands.

17 4. Attached hereto as **Exhibit A** is my current resume, which sets forth my
18 qualifications to act as a general receiver in this matter.

19 5. I am eligible to serve as the general receiver under RCW 7.60.035. I have not
20 been convicted of a felony or other crime involving moral turpitude, I am not a party in this
21 action or related to a party in this action such that I would be prevented from serving as a
22 receiver under RCW 7.60.035(2), and I do not have an interest materially adverse to the interest
23 of persons to be affected by the receivership generally, nor am I a sheriff in any county.

24 6. For the services performed as a receiver, my fee is based on an hourly rate of
25 \$225 per hour. I will be supported by FCM employees and partners, which may include

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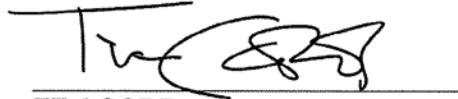
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1 temporary employees to fulfill financial advisory, accounting/bookkeeping, and other related
2 services typical in a receivership of this complexity. The fees for FCM employees (excluding
3 me as the Receiver) will be billed at a blended hourly rate of \$75. My rate and FCM
4 employees' rates may be adjusted annually.

5 I hereby declare under penalty of perjury of the laws of the State of Washington that the
6 foregoing is true and correct to the best of my knowledge and belief.

7
8 EXECUTED this 29th day of January, 2021, at Spokane, Washington.

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11 TIM COBB

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of January 2021, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to all counsel of record as follows:

Cody Easterday
5235 N Industrial Way
Pasco, WA, WA 99301
cody@easterdayfarms.com

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Telecopy (FAX)
- ☒ Via email

Peter Richter
Peter Richter:
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
prichter@paladinmgmt.com

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Telecopy (FAX)
- ☒ Via email

R. Crane Bergdahl
6119 Burden Blvd., Suite A
Pasco, WA 99301
P.O. Box 2755
Pasco, WA 99302
cranelaw@msn.com

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Telecopy (FAX)
- ☒ Via email

CHS Capital, LLC dba CHSC NM
5500 Cenex Dr.
Inver Grove Heights, MN 550077

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☒ Overnight Mail
- ☐ Telecopy (FAX)
- ☐ Via email

U.S. Small Business Administration
1545 Hawkins Blvd, Suite 202
El Paso, TX 79925

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☒ Overnight Mail
- ☐ Telecopy (FAX)
- ☐ Via email

El Paso District Office
915.834.4600
DL0050@sba.gov

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail

DECLARATION OF TIM COBB IN SUPPORT OF
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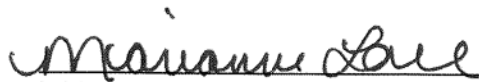
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1	Office of General Counsel	<input type="checkbox"/>	Telecopy (FAX)
2	409 3rd Street NW	<input checked="" type="checkbox"/>	Via email
3	Washington, DC 20416		
4	Brittany Biles, GC		
5	Nina Levine, Deputy GC		
6	General Inquiries: answerdesk@sba.gov		
7	AXA Equitable Life Insurance Company	<input type="checkbox"/>	U.S. Mail
8	1290 Avenue of the Americas	<input type="checkbox"/>	Hand Delivered
9	New York, NY 10104	<input checked="" type="checkbox"/>	Overnight Mail
10	Customer Service: 877.222.2144	<input type="checkbox"/>	Telecopy (FAX)
11		<input type="checkbox"/>	Via email
12	Equitable Financial Life Insurance Company	<input type="checkbox"/>	U.S. Mail
13	16th Floor, 1290 Avenue of the Americas	<input type="checkbox"/>	Hand Delivered
14	New York, NY 10104	<input checked="" type="checkbox"/>	Overnight Mail
15	Customer Service: 877.222.2144	<input type="checkbox"/>	Telecopy (FAX)
16		<input type="checkbox"/>	Via email
17	The Prudential Insurance Company of America	<input type="checkbox"/>	U.S. Mail
18	2100 Ross Avenue, Suite 2500	<input type="checkbox"/>	Hand Delivered
19	Dallas, TX 75201	<input checked="" type="checkbox"/>	Overnight Mail
20	Loan Nos. 717611839 & 717611840	<input type="checkbox"/>	Telecopy (FAX)
21	214.777.4500	<input type="checkbox"/>	Via email
22	214.721.6007		
23	Rabo Agrifinance, Inc., as Mortgagee	<input type="checkbox"/>	U.S. Mail
24	12443 Olive Blvd, Suite 50	<input type="checkbox"/>	Hand Delivered
25	St. Louis, MO 63141	<input type="checkbox"/>	Overnight Mail
	855.722.7766	<input type="checkbox"/>	Telecopy (FAX)
	CustomerConnect@RaboAg.com	<input checked="" type="checkbox"/>	Via email
	Big Bend Electric Cooperative, Inc.	<input type="checkbox"/>	U.S. Mail
	P.O. Box 348	<input type="checkbox"/>	Hand Delivered
	Ritzville, WA 99169	<input type="checkbox"/>	Overnight Mail
	866.844.2363	<input type="checkbox"/>	Telecopy (FAX)
	Admin@bbec.org	<input checked="" type="checkbox"/>	Via email

DECLARATION OF TIM COBB IN SUPPORT OF
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MARIANNE LOVE, PARALEGAL

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EXHIBIT A

January - 2021

Subject: Farmland Company Management Profile

Company Founded: 1993 as Sharp and Hatley, Inc. (by John Sharp and Allen Hatley) Revised in 2013 to Hatley/Cobb Farmland Management (by Allen Hatley and Tim Cobb), Rebranded to Farmland Company January 2020 upon retirement and business transition completion.

Current Owners: Tim and Janelle Cobb

Employees: 4 (Four)

Services:

- **Farmland Management** (Dry land grain and Irrigated row crop Farms) throughout the Pacific Northwest.
 - Absentee owner representation.
 - Direct and Custom Farming operations management.
 - Farmland Leasing.
 - USDA and FSA correspondence and contract management including CRP.
 - Crop Insurance management.
 - Farmland Real Estate Tax management.
 - Operating expenses.
 - Grain and crop marketing.
 - Farmland operations accounting.
 - Farmland Risk Management Services.
- **Farmland Real Estate Brokerage**- Sales and Acquisitions (\$60 million in farmland in the past 3 years).
- **Farmland Appraisals** – Farmland certified general appraisals, land partition proceedings, farmland inspection and inventory services.
- **Farmland Insurance**- From Crop Insurance to farm property and equipment insurance, we cover your Farmland assets.
- **Farmland Consulting** -(expert witness, market price and opinions of value, estate planning, long term strategic planning for farm families, court appointed representative, receivership, third party inspection and management)
- **Farmland Technology** -(proprietary farm management software and decision making tools)

Farms / Acres Managed: 130+ farms / 120,000 + acres across 5 states.

Offices: Located in Spokane Washington

Website: www.farmlandcompany.com

We thank you for the inquiry into our company and hope we can work together to help manage your farmland asset.

2828 E. 32nd Avenue, Suite B, Spokane WA 99223 / 509.624.4408 PH 509.624.4409 FAX
info@farmlandcompany.com EMAIL www.FarmlandCompany.com

**BACKGROUND INFORMATION
FOR
TIM COBB**

PERSONAL:

Tim was raised on an irrigated farm and beef cattle ranch in a portion of Grant County Washington known as the Columbia Basin. He graduated from Ricks College in 2001 with a degree in Agronomy (crop and soil science), followed by a bachelor's degree in Agriculture and Business at Washington State University in 2003. After this he received his Master of Business Administration (MBA) in the spring of 2005. Tim has worked in production agriculture (farming crops and commodity marketing), in the produce industry (fresh pack potatoes), in the cattle industry (both production and sales) and most recently in commercial real estate acquisitions (licensed broker in multiple states).

In agriculture it has been my mission to create new and innovative ways to increase profitability and efficiencies. Emerging markets and value-added products have been a focus as we positioned our production to serve certain sectors of demand and need.

After 9 years being mentored by John Sharp and Allen Hatley Tim and his wife Janelle now are the owners of Farmland Company Management and are eager to continue their agriculture endeavors with new and innovative technologies to lift the company and its clients to further financial success. Currently they live in Spokane are the proud parents of four well behaved children... Taylor, Jarom, Tacen, and Jett. Fun activities include running, flying, snow skiing, sailing, and teaching the kids how to work.

Business Address: 2828 E. 32nd Ave. Suite B
Spokane, WA 99223
Phone: (509) 624-4408

EDUCATION:

- 2001 Associates Degree – Ricks College (BYU-Idaho), Agronomy (Crop and Soil Science)
- 2003 Bachelor of Science - **Washington State University**, Agriculture (Business and Economics)
- 2005 Masters of Business Administration (MBA), Northwest Nazarene University

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2006	Idaho Real Estate School (Licensed Sales Agent)
2007	Idaho Real Estate Brokerage Management
2007	Idaho Real Estate Appraisal and Valuation
2007	Idaho Real Estate Law
2007	Idaho Real Estate Finance
2008	CCIM Module one Introduction to Commercial Investment RE Analysis
2011	Washington Real Estate Broker
2012	Northwest Farm Credit Services Agriculture Young Producer
2015	Completed National Accredited Farm Manager Designation (AFM) from the Association of Farm Managers and Rural Appraisers (AFMRA)
2019-2020	Real estate Brokerage license in the State of Texas

EMPLOYMENT:

2011-Present Purchased Farmland Company Management (formally known as Sharp and Hatley Inc. and Hatley/Cobb Farmland Management) responsibilities include accounting management, clerical oversight, and assisting the company in providing Professional Farm Management, Appraisal & Consulting Services, additionally providing brokerage services to the agriculture industry.

2009-Present Owner/Partner of Six C Hay and Cattle Companies, production farming of forage, grain and fresh crops as well as cattle production and management of marketing and commodity positions.

2008-Present Owner/ Partner Vantage Partners LLC. Real Estate Brokerage representing non-profit developers of affordable housing for low income families and seniors.

2007-2011 Owner of Envision Real Estate Group as Principal Broker including representation of developers across 12 states exclusively in land acquisitions. In addition to

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this I worked for a Non-Profit developer of affordable housing in the development of Apartment communities for low income families and seniors.

2006-2007 Sales agent for commercial real estate brokerage.

2004-2006 Marketing and Sales for regional cattle company, worked in the risk management department analyzing futures positions of feeder and live cattle, along with high end beef sales and marketing.

2002-2004 Crop and Commodities Manager with oversight of farm and ranch operations, commodity risk management, grain and logistics division director.

PROFESSIONAL ORGANIZATION AFFILIATIONS:

Agriculture Marketing and Management Organization (contributing seminar teacher)

Washington Wheat Growers Association (regular contributing writer for Wheat Life Magazine)

American Society of Farm Managers and Rural Appraisers (State Chapter Board of Directors)

National Association of Realtors (Real Estate Broker Multiple States)

Washington Cattleman's association (cow calf producer and cattle feeding member)

COMMUNITY ACTIVITIES:

Non-profit work Community Development Inc. Group of Companies (land acquisition for affordable housing)

Ecclesiastical leadership in local church congregation.

4-H (Parent leader and Director)

Washington Chapter of American Society of Farm Managers and Rural Appraisers (immediate past president of Washington Chapter)

Spokane AG Expo (Immediate Past President/ board member)

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